

BEFORE THE ADMINISTRATIVE HEARING COMMISSION  
STATE OF MISSOURI

DIRECTOR OF THE DEPARTMENT )  
OF INSURANCE, FINANCIAL )  
INSTITUTIONS & PROFESSIONAL )  
REGISTRATION )  
STATE OF MISSOURI, )

Petitioner, )

vs. )

RACHEL A. BOESSEN-CORLEONE, )

Respondent. )

**FILED**

AUG 14 2009

ADMINISTRATIVE HEARING  
COMMISSION

Case No.: 09-0529 DI

**MOTION FOR SERVICE BY PUBLICATION**

COMES NOW, Petitioner, the Director of the Missouri Department of Insurance, Financial Institutions and Professional Registration, through counsel, to move for service upon Respondent Rachel A. Boessen-Corleone by publication pursuant to §621.100, RSMo (Supp. 2008) and §506.160, RSMo (2000). In support of his Motion, Petitioner states as follows:

1. Petitioner filed a Complaint against Respondent with the Commission on April 21, 2009, seeking a finding that he has cause to discipline Respondent's license.
2. On April 29, 2009, the Commission attempted to serve the Complaint upon Respondent via certified mail at a Jefferson City, Missouri, address Respondent provided to Petitioner. The United States Postal Service forwarded the certified mail to Kansas City where it was unclaimed and subsequently returned to the Commission on May 28, 2009.
3. The Commission prepared a service packet for Petitioner to attempt personal service.

4. Upon information and belief, Respondent now resides at 5432 Harvard Avenue, Raytown, Missouri 64133.
5. Petitioner contracted with Hatfield Process Service (Hatfield) in Kansas City, Missouri, to serve Respondent.
6. Hatfield process server, Mark Kitchens, attempted to serve Respondent at 5432 Harvard Avenue, Raytown, Missouri 64133, on multiple occasions. See Exhibit 1, attached. Kitchens attempted to serve Respondent as follows:
  - a. Tuesday, June 30, 2009, at 8:30 p.m.
  - b. Wednesday, July 1, 2009, at 7:05 p.m.
  - c. Friday, July 3, 2009, at 7:30 a.m.
  - d. Monday, July 6, 2009, at 9:50 a.m.
  - e. Friday, July 10, 2009, at 9:30 a.m.
  - f. Wednesday, July 15, 2009, at 4:50 p.m.
  - g. Saturday, July 18, 2009, at 6:00 p.m.
  - h. Monday, July 20, 2009, 3:57 p.m.

See Exhibit A, attached.

7. Kitchens observed a Buick with license plate DC2 L7H parked in front of 5432 Harvard Avenue, Raytown, Missouri 64133.
8. Department of Revenue records indicate a Buick with license plate DC2 L7H is registered to Lorenzo Corleone and a Boessen-Corleone at 1010 Holly Drive, Jefferson City. See Exhibit B, attached.
9. Even though Kitchens visited Respondent's residence on eight occasions, on different days of the week, and at different times, he was unable to personally

serve Respondent. However, Kitchens did provide the service documents to Respondent's spouse, Lorenzo Corleone on Monday July 20, 2009, at 3:57 p.m.

10. Respondent's avoidance of service is consistent with the conduct giving rise to the Complaint. Specifically, Count I of the Complaint alleges that Respondent failed to respond to two Department inquiries. Count II of the Complaint alleges that Respondent failed to inform Petitioner of a change of address in a timely manner.
11. Respondent has concealed herself such that the ordinary process of law cannot be personally served upon her.

**WHEREFORE**, based on the foregoing, Petitioner respectfully requests that the Commission authorize service by publication pursuant to §621.100, RSMo (Supp. 2008) and §506.160, RSMo (2000).

Respectfully submitted,



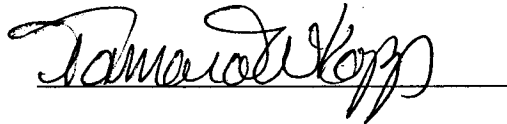
Tamara W. Kopp  
Missouri Bar # 59020  
Senior Enforcement Counsel  
Missouri Department of Insurance,  
Financial Institutions & Professional  
Registration  
301 West High Street, Room 530  
Jefferson City, Missouri 65101  
Telephone: (573) 751-2619  
Facsimile: (573) 526-5492  
Tamara.kopp@insurance.mo.gov

ATTORNEY FOR PETITIONER  
Director of the Missouri Department  
of Insurance, Financial Institutions &  
Professional Registration

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing document, including attachments, was forwarded by first class mail, with sufficient postage attached, this 14th day of August, 2009, to:

Ms. Rachel A. Boessen-Corleone  
5432 Harvard Avenue  
Raytown, Missouri 64133

A handwritten signature in cursive script, appearing to read "Tamarice Kopp", is written over a horizontal line.

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**DIRECTOR OF THE DEPARTMENT  
OF INSURANCE, FINANCIAL  
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REGISTRATION  
STATE OF MISSOURI,**

**Petitioner,**

**vs.**

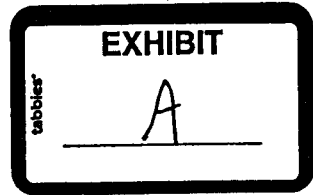
**RACHEL A. BOESSEN-CORLEONE,**

**Respondent.**

**State of Missouri  
County of Jackson**

**ss.**

**Case No.: 09-0529 DI**



**AFFIDAVIT OF MARK A. KITCHENS**

COMES NOW affiant, Mark A. Kitchens, and states and attests under oath as follows:

1. My name is Mark A. Kitchens. I am a Process Server with Hatfield Process Service. My office is located at 1669 Jefferson, Kansas City, Missouri 64108.
2. I have personal knowledge of and am competent to attest to the matters stated herein. The information provided herein is true and accurate to the best of my knowledge, information, and belief.
3. To the best of my knowledge and belief, Respondent Rachel A. Boessen-Corleone currently resides at 5432 Harvard Avenue, Raytown, Missouri 64133, with her spouse, Lorenzo Corleone.
4. According to my records, I attempted to serve Respondent Rachel A. Boessen-Corleone on eight occasions at 5432 Harvard Avenue, Raytown, Missouri 64133, as follows:

- a. On Tuesday, June 30, 2009, at 8:30 p.m., there were no cars in the driveway, no answer at the door, and no lights on within the house.
  - b. On, Wednesday, July 1, 2009, at 7:05 p.m., Lorenzo Corleone answered the door and confirmed that he was Respondent's spouse. He stated that Respondent was not home.
  - c. On, Friday, July 3, 2009, at 7:30 a.m., there were no cars in the driveway.
  - d. On, Monday, July 6, 2009, at 9:50 a.m., there was no answer at the door and no lights on within the house
  - e. On, Friday, July 10, 2009, at 9:30 a.m., there was no answer at the door and neighbors indicated that they had not seen Respondent or her spouse.
  - f. On, Wednesday, July 15, 2009, at 4:50 p.m., there was no answer at the door. However, two cars were parked at the house. The cars, a green sedan and a blue Buick, had the same Missouri license plate on the back side reading DC2 L7H.
  - g. On, Saturday, July 18, 2009, at 6:00 p.m., there were no cars in the driveway, no answer at the door, and no lights on within the residence.
  - h. On, Monday, July 20, 2009, 3:57 p.m., I gave the service documents to Respondent's spouse, Lorenzo Corleone.
5. Further affiant sayeth naught.



Mark A. Kitchens  
Process Server

In witness whereof I have hereunto subscribed my name and affixed my official seal this 11<sup>th</sup> day of August, 2009.



Notary

My commission expires: 10/15/12

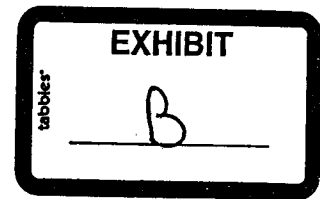


D. SUSAN ROSE  
My Commission Expires  
October 15, 2012  
Platte County  
Commission #08606673

JAY NIXON  
GOVERNOR



ALANA M. BARRAGÁN-SCOTT  
ACTING DIRECTOR OF REVENUE



## MISSOURI DEPARTMENT OF REVENUE

### CERTIFICATION PURSUANT TO § 302.312, RSMo

My name is Richard Baumgartner I am of sound mind and personally acquainted with the facts herein stated:

I am a custodian of records for the Missouri Department of Revenue. Attached hereto are records from the Missouri Department of Revenue. These records are lawfully deposited with the Missouri Department of Revenue in the regular course of business, and it was the regular course of business of the Department of Revenue and/or the reporting agency or entity for an employee or representative of said Department and/or agency or entity with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time of the act, event condition, opinion or diagnosis. It is further certified pursuant to § 302.312, RSMo, that the records attached hereto are exact duplicates of the original records lawfully filed or deposited with the Department of Revenue by the reporting agency or entity pursuant to the provisions of Chapters 301, 302, 303 and/or 577, RSMo.

A handwritten signature in cursive script, reading "Richard Baumgartner".  
Custodian of Records

Certified this 10<sup>th</sup> day of Aug, 2009.

LICADC2L7H,11

RESTRICTED-RECORD      \*\* MISSOURI DEPARTMENT OF REVENUE \*\* UPDATED  
TITLE-NO. - TAC79137    \*\*    GENERAL REGISTRATION MASTER    \*\*    4 03 09  
                                 CURRENT DATE - 08/10/09  
MAKE YEAR VIN                    DUP-CODE HIST-FLG KOV BODY-STYLE HP FUEL CYL  
BUIC    01    1G4CW54K114147535                    PASSG    SEDAN            34    G  
  
AXLES REC-TYPE O-TRN-TYPE    OWN-NAME CORLEONE LORENZO A & BOESSEN-CORLEONE\*  
         TITL&REG TITLE ONLY    OWN-ADDR 1010 HOLLY DR                    OWN-CNTY COLE  
                                 OWN-CITY JEFFERSON CITY    OWN-STATE MO OWN-ZIP 65109

\*\* REGISTRATION RECORD 1 \*\*

LIC-NO PLATE-TYPE                    TAB-NO    EXPIR-MO EXPIR-YR BATCH-NO APP-DATE  
DC2L7H PASSENGER                                    03            11            TRIPS        3 31 09

OFFICE-NO LIC-ISS-1    2-YEAR-REG R-TRN-TYPE WGT/SEAT ZONE  
          213        033109            YES            RENEW REG

MORE INFORMATION FOLLOWS

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bedwell



LICADC2L7H,11

\*\* TITLE DATA RECORD \*\*

TITLE-NO	TITLE-TYPE	PURCH-DATE	T-APP-DATE	ISSUE-DATE	NEW-USED	DEALER-NO
TAC79137	ORIGINAL	1 29 08	3 13 08	3 17 08	USED INST	0303

ODOM-READG	ODOM-FLAG	EXEMPT-NO	TAX-AMOUNT	CONTROL-NO	BRAND-CODE
83677			394.66		

\*\*\*\* FIRST LIENHOLDER \*\*\*\*

L-NAME-1	JPMORGAN CHASE BANK	L-NO-1	1
L-ADDR-1	PO BOX 901098	L-DATE-1	01 29 08
L-CITY-1	FORT WORTH	L-STATE-1	TX
		L-ZIP-1	76101

MORE INFORMATION FOLLOWS

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bedwell

LICADC2L7H,11

\*\* ACTIVITY RECORD \*\*

ACT-TYPE-1: LIC TRF  
ACT-DATE-1: 4 03 08  
ACT-BTCH-1: TRIPS  
A-FLD-ID-1:

ACT-TYPE-2:  
ACT-DATE-2:  
ACT-BTCH-2:  
A-FLD-ID-2:

NO FURTHER INFORMATION AVAILABLE

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bedwell

## RENEW MOTOR VEHICLE REGISTRATION RECEIPT

STAPLE HERE



2 0 0 9 2 3 5 2 1 3 0 0 6 D F 3 2 5 9 0 0 3 6 0 0 0 1

Page 1 of 1

## OWNER INFORMATION

CORLEONE LORENZO A & BOESSEN-CORLEONE \*  
1010 HOLLY DR  
JEFFERSON CITY, MO 65109

TELEPHONE # : ( ) -

COUNTY: COLE

## VEHICLE INFORMATION

MAKE	YEAR	VEHICLE ID NUMBER	KIND OF VEHICLE	BODY STYLE	FUEL TYPE	ODOMETER	HORSEPOWER
BUIC	2001	1G4CW54K114147535	PASSENGER	SEDAN	GASOLINE		34
TITLE NUMBER	PURCHASE DATE						
TAC79137	01/29/2008						

## REGISTRATION INFORMATION

CURRENT REGISTRATION TYPE	CURRENT NUMBER	EXPIRATION
PLATE STANDARD PASSENGER NON-VANPOOL	DC2L7H	03/2011

## ISSUED INVENTORY INFORMATION

INVENTORY TYPE	INVENTORY NUMBER
PASSENGER/RV MARCH	DC2L7H
SET TABS - 2011	R3615201

## FEE INFORMATION

DESCRIPTION - CODE	AMOUNT
REGISTRATION FEE / PASSENGER - 0001	\$48.50
AGENT FEE / AGENT FEE - 0708	\$7.00
PLATE RE-ISSUANCE FEE / EMBOSS PLATE REISSUANCE FEE - 0709	\$2.78
<b>TOTAL PAID:</b>	<b>\$58.28</b>

You must present your insurance card (a copy is acceptable) or other acceptable proof of financial responsibility. Any false statement in this receipt is a violation of the law and may be punished by fine or imprisonment or both.

## SIGNATURE STATEMENT

I hereby certify that the statement(s) herein are true to the best of my knowledge. I also certify that I have and will maintain, during the period of registration, financial responsibility with respect to each motor vehicle that I own, license or operate on the streets or highways.

SIGNATURE: **X**

NOTE: The Missouri Department of Revenue may electronically resubmit checks returned for insufficient or uncollected funds. Other restrictions may apply.

## FOR OFFICE USE ONLY

PREVIOUS NUMBER	EXPIRATION DATE	VERIFICATION
254SPT	03/2009	Safety Inspection: Verified Financial Responsibility: Verified Personal Property Tax: Verified 2008

RAYTOWN  
213006  
DF3259  
WORKSTATION 3

Missouri Department of Revenue  
PO Box 100  
Jefferson City, MO 65105-0100  
(573) 751-4509  
www.dor.mo.gov/mvdl



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